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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICALDEN INVESTMENTS S.A.,	: Case No 07 Civ. 2395 (VM)
	:
Plaintiff,	: REPLY IN FURTHER SUPPORT OF
	: MOTION TO DISMISS THE
vs.	: COMPLAINT PURSUANT TO FED.
	: R. CIV. P. 12(b)(6) AND IN
OLGA ROSTROPOVICH, COOLEY GODWARD :	OPPOSITION TO MOTION BY
KRONISH LLP, RENEE SCHWARTZ, ATOOSA :	MICALDEN INVESTMENTS S.A.
P. MAMDANI and MAHMOUD A. MAMDANI, :	FOR LEAVE TO FILE SECOND
	: AMENDED COMPLAINT
Defendants.	:
	:
----- X	

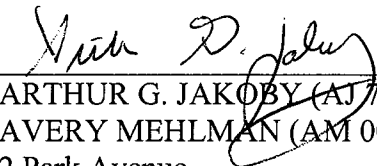
In support of their motion in opposition to Micalden Investments S.A.'s motion to file a second amended complaint, Atoosa P. Mamdani and Mahmoud A. Mamdani (collectively, the "Mamdanis") rely upon the Memorandum of Law of defendants Cooley Godward Kronish LLP and Renee Schwartz in Further Support of its Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6), and in opposition to the motion by Micalden Investments S.A. for leave to file a second amended complaint, dated October 17, 2007.

Accordingly, the Mamdanis request that: (i) this action be dismissed, or alternatively, (ii) this motion be held in obedience so that the Mamdanis may conduct limited

discovery concerning the alleged security agreements, (iii) Micalden's motion for leave to file the second amended complaint be denied, and (iv) such further relief as may be just and proper.

Dated: October 17, 2007

HERRICK, FEINSTEIN LLP

By 
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